

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DANIEL MEDINA and NIKITA GROSS,

Plaintiffs,

v.

PUBLIC STORAGE, INC., a Maryland Real
Estate Investment Trust, WILLIS INSURANCE
SERVICES OF CALIFORNIAN, INC., a
California Corporation, and PS ILLINOIS
TRUST,

Defendants.

Civil Action No. _____

Cook County Circuit Case No.
2011-L-011664

**AFFIDAVIT OF DUNIA HAMDEN IN SUPPORT OF
DEFENDANT PUBLIC STORAGE'S NOTICE OF REMOVAL**

1. I am over the age of 18 and am competent to make this declaration. I have personal knowledge of the facts stated herein as a result of my employment with Public Storage ("Public Storage") and, if called to testify concerning them, could do so competently.

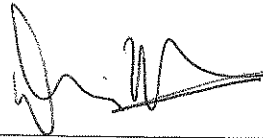
2. I am employed by Public Storage as Claims Manager in the Risk Management Department. I have held this position for nearly eight years. In total, I have been with the company for almost nine years. As Claims Manager, I am Public Storage's liaison to the third party claims administrator who handles the claims filed by Public Storage customers as part of the Willis Storage Insurance Program.

3. Public Storage is a Maryland Real Estate Investment Trust organized under the laws of the state of Maryland. Its principal place of business is in California and the headquarters is located at 701 Western Avenue, Glendale, California, where most of the company's management, operational, and administrative personnel are located.

4. Based on the Complaint, it is my understanding that plaintiffs are seeking to sue on behalf of all persons who, within the past four (4) years, have (i) rented a storage unit from Public Storage in Illinois; (ii) purchased coverage for such storage unit as an insured under a Willis Insurance Services of California Program; and (iii) submitted a claim for burglary loss that

was denied on the grounds that there was insufficient evidence to establish "forcible entry." A review of the information provided to Public Storage by the third party claims administrators of the Willis Storage Insurance Program reveals that there are over 400 individuals who rented a storage unit from Public Storage in Illinois, purchased insurance for such unit, and submitted a claim for burglary loss that was denied on the grounds that there were no signs of forcible entry. All of the individuals within this proposed class of individuals had a policy limit of at least \$2,000.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this Declaration was executed on January 10, 2012, at Glendale, California.

A handwritten signature in black ink, appearing to read 'Dunia Hamden', is written over a horizontal line.

Dunia Hamden